

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Developing a Unified Inter-carrier)	CC Docket No. 01-92
Compensation Regime)	
)	

**REPLY COMMENTS
of the
SMALL COMPANY COMMITTEE OF THE LOUISIANA
TELECOMMUNICATIONS ASSOCIATION
Addressing
PHANTOM TRAFFIC INTERIM PROCESS**

Louisiana Rural Telephone Companies

**Cameron Telephone Company, LLC
Campti-Pleasant Hill Telephone Co., Inc.
CenturyTel of Chatham, LLC
CenturyTel of Central Louisiana, LLC
CenturyTel of East Louisiana, LLC
CenturyTel of Evangeline, LLC
CenturyTel of North Louisiana, LLC
CenturyTel of Northwest Louisiana, Inc.
CenturyTel of Ringgold, LLC
CenturyTel of Southeast Louisiana, Inc.
CenturyTel of Southwest Louisiana, LLC
Delcambre Telephone Co., Inc.
East Ascension Telephone Co., LLC
Elizabeth Telephone Company, LLC
Kaplan Telephone Co., Inc.
Lafourche Telephone Co., LLC
Northeast Louisiana Telephone Co., Inc.
Reserve Telephone Co., Inc.
Star Telephone Co., Inc.**

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January 5, 2007

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The Small Company Committee of the Louisiana Telecommunications Association (the "SCC") hereby submits these reply comments concerning the interim process to address phantom traffic and the related proposal for the creation and exchange of call detail records contained in a written *ex parte* filed November 6, 2006 by the Supporters of the Missoula Plan.¹ The SCC of the Louisiana Telecommunications Association is comprised of the Rural Telephone Companies (47 U.S.C. §153(37)) providing service in the rural areas of Louisiana.²

GENERAL REPLY COMMENTS

The problem of "phantom traffic" - traffic which lacks complete or correct identification and thus cannot be properly billed - must be solved before any

¹ See Public Notice, *Comment Sought on Missoula Plan Phantom Traffic Interim Process and Call Detail Records Proposal*, DA 06-2294, CC Docket No. 01-92 (rel. November 8, 2006).

² The SCC is comprised of the following Louisiana rural telephone companies: Cameron Telephone Company, LLC, Campti-Pleasant Hill Telephone Co., Inc., CenturyTel of Chatham, LLC, CenturyTel of Central Louisiana, LLC, CenturyTel of East Louisiana, LLC, CenturyTel of Evangeline, LLC, CenturyTel of North Louisiana, LLC, CenturyTel of Northwest Louisiana, Inc., CenturyTel of Ringgold, LLC, CenturyTel of Southeast Louisiana, Inc., CenturyTel of Southwest Louisiana, LLC, Delcambre Telephone Co., Inc., East Ascension Telephone Co., LLC, Elizabeth Telephone Company, LLC, Kaplan Telephone Co., Inc., Lafourche Telephone Co., LLC, Northeast Louisiana Telephone Co., Inc., Reserve Telephone Co., Inc., and Star Telephone Co., Inc.

comprehensive intercarrier compensation reform regime can work. As explained by CenturyTel in its comments, the existence of phantom traffic prevents carriers from fully recovering intercarrier compensation payments that they are owed while imposing direct costs arising from tracking such traffic to avoid network congestion.³ As further explained by CenturyTel, phantom traffic impacts carriers' ability to invest in networks and services, and undermines their ability to ensure adequate facilities are in place to meet consumers' evolving and expanding needs.⁴

For the reasons set forth in the SCC and CenturyTel's opening comments on the Missoula Plan, the SCC urges the Commission immediately to adopt phantom traffic rules that: 1) require proper identifying information to be included in call signaling; 2) require the provision of call detail records to terminating carriers on reasonable terms; 3) require cooperation among carriers to identify the source of traffic; and 4) signal the Commission's intent and resolve to enforce these rules. The Commission should adopt phantom traffic rules, while continuing its consideration of comprehensive intercarrier compensation solutions.⁵

SPECIFIC COMMENTS

The "Interim Phantom Traffic Solution" proposed by the Missoula Plan supporters consists of two parts.⁶ First, the supporters of the Missoula Plan request that the Commission (1) implement the proposals in the Missoula Plan concerning call signaling and enforcement, (2) confirm that carriers sending traffic via indirect

³ Comments of CenturyTel, Inc., *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, at page 2 (filed December 7, 2006) ("CenturyTel Interim Phantom Traffic Proposal Comments").

⁴ Id.

⁵ Id., at page 3.

⁶ See, Letter from Supporters of the Missoula Plan to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92 (filed November 6, 2006)(Missoula Plan Nov. 6 *Ex Parte*) at page 2.

interconnection arrangements, i.e., using tandem transit services, are responsible for paying terminating carriers applicable intercarrier compensation charges and transit service providers are not, and (3) extend the requirements of its *T-Mobile Order*⁷ to interconnection arrangements between ILECs and other wireline carriers.⁸ The SCC supports the goals of the “Interim Phantom Traffic Solution” proposed by the Missoula Plan supporters. In particular, the SCC supports the proposal to extend the requirements set forth in the Commission’s *T-Mobile Order* to interconnection arrangements between incumbent LECs and other wireline carriers.⁹

The second part of the Interim Phantom Traffic Solution proposed by the Missoula Plan supporters is the “Interim Process for the Creation and Exchange of Call Detail Records and Call Summary Information” (the “Interim Process”).¹⁰ According to the Missoula Plan supporters, the key improvement proposed in the Interim Process is a uniform requirement to provide transit traffic call information, which currently does not occur in all instances.¹¹ The SCC supports a uniform requirement that transit traffic call information be provided to the terminating carrier in all instances so that the terminating carrier can properly bill the carrier originating such traffic.

However, the SCC agrees with CenturyTel that some aspects of the interim and permanent procedures proposed by the Missoula Plan’s supporters, and certain aspects of the proposed requirements concerning call signaling information, do not go far enough to

⁷ Developing a Unified Intercarrier Compensation Regime, T-Mobile, et. al. Petition for Declaratory Ruling Regarding Incumbent LEC Wireless Termination Tariffs, *Declaratory Ruling and Report and Order*, 200 FCC Rcd. 4855, CC Docket No. 01-92 (rel. Feb. 24, 2005).

⁸ Missoula Plan Nov. 6 *Ex Parte* at page 2.

⁹ See Phantom Traffic Proposal at 2 (citing *Developing a Unified Intercarrier Compensation Regime; T-Mobile et al. Petition for Declaratory Ruling Regarding Incumbent LEC Wireless Termination Tariffs, Declaratory Ruling and Report and Order*, 200 FCC Rcd 4855 (2005) (“*T-Mobile Order*”).

¹⁰ Missoula Plan Nov. 6 *Ex Parte* at page 2.

¹¹ *Id.*

eliminate phantom traffic and therefore do not adequately protect consumers from the consequences of this problem.¹² The SCC supports and adopts the recommendations proposed by CenturyTel as set forth in its comments filed herein.¹³

In particular, the SCC agrees with CenturyTel that carriers that currently receive call detail records at no charge should not be subject to new charges at the transiting carrier's sole option.¹⁴ If adopted by the Commission, the Interim Process would entitle a Transit Provider to charge the Terminating Carrier \$0.0025 per call detail record that the Transit Provider creates where the Transit Provider: (1) does not currently provide call detail records or call summary information and begins providing Category 11-01-XX call detail records that conform with the requirements prescribed in the Uniform Process proposed under the Missoula Plan; (2) replaces call summary information that it currently provides with Category 11-01-XX call detail records that conform with the requirements prescribed in the Uniform Process proposed under the Missoula Plan; and, (3) replaces call detail records that it currently provides in an EMI format other than Category 11-01-XX call detail records that conform with the requirements prescribed in the Uniform Process proposed under the Missoula Plan.¹⁵ The SCC opposes allowing transiting providers unilaterally to change the method by which they provide call detail records and then to impose fixed charges on terminating carriers for doing so.

In contrast to the Interim Process, the Uniform Process proposed under the Missoula Plan states that "charges for the creation and distribution of call detail records under the Uniform Process are covered by the charges for Tandem Transit Service

¹² CenturyTel Interim Phantom Traffic Proposal Comments at page 4.

¹³ See CenturyTel Interim Phantom Traffic Proposal Comments at pages 4 – 12.

¹⁴ CenturyTel Interim Phantom Traffic Proposal Comments at pages 5 – 6.

¹⁵ Missoula Plan Nov. 6 *Ex Parte* at page 11.

prescribed in the [Missoula] Plan and no additional charges shall apply.”¹⁶ Likewise, the Interim Process should prohibit transiting providers unilaterally to change the method by which they provide call detail records, and should prohibit them from unilaterally imposing charges on terminating carriers for doing so.

The SCC appreciates the opportunity to submit these reply comments.

Respectfully submitted,

**THE SMALL COMPANY COMMITTEE OF
THE LOUISIANA TELECOMMUNICATIONS
ASSOCIATION**

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¹⁶ Missoula Plan Nov. 6 *Ex Parte* at page 6.